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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

**SCHUYLER HOFFMAN,
INDIVIDUALLY AND ON
BEHALF OF ALL OTHERS
SIMILARLY SITUATED,**

Plaintiff,

v.

BANK OF AMERICA, N.A.,

Defendant.

Case No.: 3:12-cv-539 JAH (DHB)

**SUPPLEMENTAL STATEMENT IN
FURTHER SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

DATE: November 3, 2014

TIME: 2:30 P.M.

COURTROOM: 13B

HON. JOHN A. HOUSTON

Plaintiff SCHUYLER HOFFMAN ("Plaintiff"), by and through Plaintiff's attorneys of record, hereby submits the following Statement supplementing Plaintiff's Motion for Final Approval. [ECF No. 56].

On August 25, 2014, Plaintiff lodged Plaintiff's Motion for Final Approval of Class Action Settlement. [ECF No. 56]. Thereafter, Objector SUSAN HOUSE opposed Plaintiff's Final Approval Motion and objected to the settlement. [ECF Nos. 57; and, 58]. After reviewing House's objections, Plaintiff met and conferred with House on each perceived issue with the guidance of the Honorable Herbert B. Hoffman (Ret.) of Judicate West. [See Plaintiff's Reply in Support of Final Approval, ECF No. 60, 2:11-15]. Following this meet and confer, Plaintiff agreed to extend the class notice period and to accept any late claims. [ECF No. 60].

As a result, House withdrew House's objections on October 1, 2014. [ECF No. 63].

During this extended claims period, twenty-four new claims were received by the claims administrator, Garden City Group, Inc. [Garden City Group, Inc.'s Declaration on this issue is forthcoming]. Plaintiff submits the following table to summarize to this Court the updated information relevant to Plaintiff's Motion which includes the twenty-four additional claims discussed herein.

TOTAL SETTLEMENT	\$2,600,000.00
NOTICE COSTS	\$323,668.20
LITIGATION COSTS	\$9,343.33
ATTORNEYS' FEES REQUESTED	\$650,000.00
INCENTIVE AWARD	\$1,500
TOTAL NUMBER OF VALID CLAIMS FOLLOWING EXTENDED CLAIMS PERIOD	916 ¹
AWARD PER CLAIMANT	\$1,763.63 ²

¹ 892 valid claims were received before the extended claims period

1 Based upon the above, Plaintiff requests this Court grant final approval of this
2 class action settlement.

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4 Dated: October 28, 2014

Respectfully submitted,

5 **KAZEROUNI LAW GROUP, APC**

6 By: /s/ Abbas Kazerounian

7 ABBAS KAZEROUNIAN, ESQ.

8 ATTORNEY FOR PLAINTIFF, SCHUYLER HOFFMAN
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28 ² The award per claimant was calculated based upon the maximum amount of costs, fees and incentive award as requested by Plaintiff's counsel and are subject to Court approval.